

Remarks:

The above amendments and these remarks are responsive to the Office action dated March 9, 2007.

Prior to entry of this Amendment, claims 1, 3, 4, and 7-25 remained pending in the present application. Claims 1, 3, 4 and 7-14 have been allowed. Claims 15-25 stand rejected variously under 35 U.S.C. §102(a) or 35 U.S.C. §103(a) based on Japanese Publication No. JP2001298779 to Takahashi ("Takahashi"), either alone or in combination with U.S. Patent No. 6,801,935 to Shen ("Shen") and/or U.S. Patent No. 6,859,832 to Gecht ("Gecht"). Applicants respectfully traverse the rejections for at least the reasons set forth below. Applicants thus request reconsideration of the application and allowance of the pending claims.

As noted above, all rejected claims (claims 15-25) have been rejected based on Takahashi, a Japanese publication with an effective prior art date corresponding to its publication date, October 26, 2001. The present application was filed on February 11, 2002.

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Applicants note, however, that their invention of the subject matter recited in claims 15-25 preceded the effective prior art date of Takahashi. As demonstrated by the Declaration Under §1.131 provided herewith, applicants conceived of their invention prior to October 26, 2001, and following such conception, diligently worked toward creation of a commercial implementation of their invention. Such activities are demonstrated at least in part by Exhibit 1 to the Declaration Under §1.131, which is an HP Invention Disclosure dated May 1, 2001. Applicants thus submit that Takahashi is not prior art to applicants claims, and that the rejections under 35 U.S.C. §102(a) and §103(a) should be withdrawn. Claims 15-25 thus should be allowed.

Regarding the Examiner's indicated reasons that the prior art does not teach or suggest the subject matter of claims 1, 3, 4 and 7-14, applicants agree with the Examiner's conclusions regarding the patentability of the allowed claims, without necessarily agreeing with or acquiescing in the Examiner's reasoning. In particular, applicants believe that the application is allowable because the prior art fails to teach or suggest the invention as claimed, independent of how the invention is paraphrased.

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Applicants believe that this application is now in condition for allowance, in view of the previous allowance of claims 1, 3, 4 and 7-14 and the Declaration Under §1.131 provided herewith. Accordingly, applicants respectfully request that the Examiner issue a Notice of Allowability covering the pending claims. If the Examiner has any questions, or if a telephone interview would in any way advance prosecution of the application, please contact the undersigned attorney of record.

Respectfully submitted,

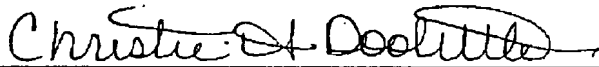
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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to Examiner J. Pokrzywa, Group Art Unit 2625, Assistant Commissioner for Patents, at facsimile number (571) 273-8300 on June 11, 2007.



Christie A. Doolittle

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